

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

SANDRA WILDER-RHODAN,

PETITIONER,

2:23-cv-771-BHH-MHC

VS.

STATE OF SOUTH CAROLINA  
FAMILY COURT JUDGE, NANCY C. McLIN  
ATTY. J. GRAHAM STURGIS, JR. ATTY. VERONICA  
G. SMALLS, VERA SIMMONS,  
ANESS JENKINS, SARAH RHODAN,  
KIMBERLY RHODAN, SHACOGA SIMMONS,  
DAVE FRIEDMAN & KELLER WILLIAM REALTY,  
WELLS FARGO BANK, ATTY JUDGE JUDE CELY  
BRIGMAN, JUDGE KENNETH E. FULP JR.  
WILLIAM J. WYLIE JR. ATTY EDUARDO CURRY,  
REP. MICHEAL F. RIVERS #121 HOUSE SEAT.  
RUFF & RUFF. ATTYS AT LAW.

DEFENDANTS,

(JURY TRIAL DEMANDED)

RECEIVED  
USDC CLERK, CHARLESTON, SC  
2023 FEB 27 AM 10:12

**SUMMONS AND COMPLAINT**

NOW COMES THE PLAINTIFF, SANDRA WILDER ROHDAN, PRO' SE in PART and request for counsel assist. The above scheme of events and conspiracy took place during an alleged fake divorce proceeding.

Plaintiff in the above named and in each and every claim hereof is complaining of each (collectively "Defendant's"). The Complaint alleges each defendant violated Title 18 of U.S. Code 1341, 1342, 1343 were violated under crimes and criminal procedure. A violation of Title 18 U.S. 1341 Frauds and swindles to devise this scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretense, representations, or promises, or sell, dispose of loan exchange, alter, give away, distribute illegally for profit or

favor. It is unprofessional conduct knowingly to assist or induce unprofessional conduct though acts of another or criminal act that adversely reflects on a lawyers honesty, trustworthiness or fitness in the profession. That all known and unknown parties are subject to all the matters and events that was conspired upon to create a scheme of dishonest, fraud and deceit and misrepresentation. The blatant circumstances and things herein alleged are in excess of over \$200,000.00 dollars in property and IRA retirement fund that were in Well Fargo Bank .The scheme of events are clearly within the jurisdiction of this Honorable Court.

### JURISDICTION

The Plaintiff, Sandra-Wilder-Rhodan, Pro Se, from about 2017 until today 21 February 2023 of North Charleston, South Carolina performed as a travel transportation service owner and employee. Sandra Wilder Rhodan and spouse George M. Rhodan were a common-law married couple over 20 years in October 2018. Both Sandra and George M. Rhodan worked different jobs and took care of both the son, Odoner Cobbs and the granddaughter Roselyn Cobbs. This action arise's under Title 18 U.S. Code 1341, 1342, 1343, and 1342, Title VII of the 1964 CRA, ADEA. Under 28. U.S. 1915 (a) (2)(B) 15 U.S. 45 UFTP, 15 U.S. code 57 (a) unfair deceptive Acts....18 U.S. Code Chapter 641, 664, 654, 656, 665. Embezzlement & Theft of Ownership Rights and Real Property. That the parties both known and unknown engaged in a scheme of events alleging George M. Rhodan had filed for a divorce. That the allegation that my husband had filed for divorce without cause raises a genuine issue that a violation of his rights under 42 U.S.C. 3610 and 18.U.S.C. 1341, 42 and 43. On behalf of an aggrieved spouse, George M. Rhodan died in Beaufort, SC the 2nd of October 2018. After three months George M. Rhodan retained counsel and filed for a divorce per documents submitted by HAND on the 10<sup>th</sup> of January 2019 in Dorchester Family Court. In the case of an offense under any of the above referenced sections the parties both known and unknown hereof are, and all matters and things herein alleged are within the jurisdiction of this honorable Court. The amount in controversy exceeds exclusive of interest, fee, compensatory damages and cost, exceeds over \$200,000.00 dollars.

1. **AS A FIRST CAUSE OF ACTION**, Defendant, Atty. J. Graham Sturgis & Vera Simmons Perpetrated a scheme, to take the real estate property and assets of Both Sandra Wilder Rhodan and George M. Rhodan located in Beaufort, South Carolina. On or about the 27 August 2017, both Sandra Wilder Rhodan and Spouse George M. Rhodan agreed to remodel their property located in Lady's Island, South Carolina. After George had retired, and Sandra continued to work as owner and employee in the transportation business as a driver and transporter at the North Charleston Airport, North Charleston, SC. Sandra Continued to support the remodeling efforts in Beaufort, S.C. One property was located at 2 Red Oak Drive, lady's Island South Carolina.

Sandra's would occasionally travel to Beaufort, South Carolina during her days off from her job and on weekends. A second property was owned by both George and Sandra Wilder Rhodan located at 5 Corner Drive, St. Helen Island, Beaufort, SC. This Property was to become a bed and breakfast . Each parcel of the real property in George M. Rhodan name has been taken and changed his ownerships right by members and unknown member falsified claims.

2. **AS A SECOND CAUSE OF ACTION**, Defendant Vera Mae Simmons and J. Graham Sturgis, Jr. undertook significant efforts to conceal their roles in the falsification of documents before the Courts that Vera Mae Simmons was the daughter George M. Rhodan in an effort be appointed as George M. Rhodan 's personal representative, forgery of his name on his Wells Fargo Account for unauthorized withdrawals of his retirement savings. J. Graham Sturgis jr.

3. **AS A THIRD CAUSE OF ACTION**, Defendant Vera Mae Simmons forged her name on the Property of Sandra Wilder Rhodan located at 303 Elliot Drive, Ladson, SC 29455. At the outset of this scheme both the Atty. J. Sturgis Graham has and continue to a Racketeering Act of robbery and conspiracy for obtaining money and property.

4. **AS A FOUR CAUSE OF ACTION**, both Vera Simmons and J. Sturgis Graham the Defendant's with known and unknown parties willfully and knowingly, did combine

their efforts to conspire, confederate, and agree together with others to commit fraud in connection with Wells Fargo Bank by freezing the assets of both Sandra Wilder-Rhodan and George M. Rhodan for property and profits from banks IRA accounts and victimized the family of their life savings. Thereby in violation of Title 18, United States Code 1343 and 1344. The taking and sale of Real Property knowingly, to defraud for profit and obtaining money for personal gain and profits.

5. **AS A FIVE CAUSE OF ACTION**, Defendant's J. Sturgis Graham and Vera Mae Simmons illegally took and created a claim of marriage on the Death Certificate of George M. Rhodan denied the true spouse, Sandra Wilder Rhodan the certificate in order to continue making withdraws on our account and deceptive acts before the local courts. The Allen Funeral Home was the official Carrier of George M. Rhodan . The expenses and last testimonial events were taken care of by the spouse's Care. It was an object of the conspiracy that demonstrated the defendants known and Unknown as the false personal representative was a fraud at every level. The financial transactions, to wit cash transaction represented the proceeds taken from the Wells Fargo accounts of both Sandra Wilder Rhodan and George M. Rhodan. The behavior represents the unlawful activity, fraud, knowing that the parties tried to conceal and disguise the nature, location source, ownership and the control of the proceeds of a specified unlawful activity under the scheme of a false allegation of a fake divorce proceeding. It is further that Representative of House Seat 121 violated State Ethics Commission probable cause by his unlawful fraudulent act of intervention in violation of Title 18, United States Code, Section 1956 (a) (1) (B) (i).

6. **AS A SIXTH CAUSE OF ACTION**, Defendant's both known and unknown and others of the conspiracy intervened in the following manner. (A). Financial transactions BBT Bank wire fraud,(B). Fraudulent house property transferred, (C) Took property changed ownership sold lot & property.(D) Took remodel property and moved in transferred Mobile unit to George M. Rhodan, (E) Realty Company listed Property.(F). Unauthorized Account breach and freezing of IRA Funds, (G) No Affidavit of

Separation, or ground for a divorce Action listed. How did he enact a divorce action after his death? Why the special provision was not enacted by the Court? (H) Legal fees 7,,500.00 Second fees 8,000.00 Spouse unlawfully paid all cost. Who hired Atty? J. Sturgis Graham to represent both clients?

7. **AS A SEVENTH CAUSE OF ACTION**, Defendant's actions is further noted that both Vera Simmons and J. Sturgis Graham Jr. known and unknown and others knowingly that the property involved in certain financial transactions, to wit, cash transactions and wire tranfers, represented the proceed of some form of unlawful activity, would and did conduct and attempt to such financial transactions, which in fact involved the proceeds **of specified unlawful activity, to wit, wire transfer, knowing that their actions in part** was to avoid a transaction reporting requirement under state or federal law, in violation of Title 18 United States Code Section 1956 (a)(1) (B) (ii).

#### CLOSING DISCLOSURE

Closing date: 11/O5/2021  
 Disbursement date 11/05/2021  
 Settlement Agent Forti Law LLC  
 File # 21-680JS

Property 303 Elliot Drive  
 Ladson, SC. 29456  
 Sale Price \$200.000.00

N. Due from seller at closing	\$200.000.00
Closing cost paid at closing	\$19,146, 88

Sandra proceeds to Sandra Wilder	\$7,518.48
----------------------------------	------------

Seller Credit	\$1,350.00
Attorney Fee for Estate	\$8,189.68
Atty Fee for Estate	\$5,000.00
Repair from From Sandra	\$14, 495.50
Estate 55% portion	\$94,591.55
Sandra 45% minus repairs	\$49,707.91

CACULATION

\$200.000.00

-\$200.000.00

Sandra Wilder Rhodan

CONFIRM RECEIPT

Sandra W. Rhodan

2227 James Bell Drive

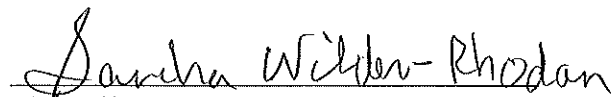
N. Charleston, SC 29406

### CONCLUSION

WHEREFORE, the parties both known and unknown did conspire through the Family Courts and Probate Courts knowing that the property involved in certain financial transactions, to falsely conduct cash transactions, which in fact involved the proceeds of specified unlawful activity, to defraud the estate of both Sandra Wilder Rhodan and George M. Rhodan under the guise of a forged unlawful divorce event. Knowing the proceeds taken were in violation of Title 18, United States Code. Section 1956 (a) (1) (B) (i). It is further probable cause that Vera Simmons and J. Sturgis Graham others known and unknown were the operators and did conspire in an effort that denied George M. Rhodan access to his medical prescriptions in a timely manner.

It shall be noted that we strongly request all damages pursuant to the unlawful activity shall fully be compensated for each and every claim found in this conspiracy. That all civil penalty against each of the Respondents for each violation of an Act pursuant to Title 18 U.S. code section 1956 (a) (1) (B) (ii). Award such additional relief as may be appropriate under Title 18, United States Code, Section 1956 (a) (1) (b) (i) Restore all property rights to Plaintiff for ownership and equal distribution rights.

Respectfully Submitted,



Plaintiff, Pro Se Sandra Wilder- Rhodan  
2227 James Bell Drive  
North Charleston, SC 29406

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this Summons and Complaint has been mailed to the following list of individuals at the following Addresses list on this \_\_\_\_\_ day of \_\_\_\_\_ 2023.

U.S. Attorney's Office  
170 Meeting Street, Suite 300  
Post Office Box 978  
Charleston, South Carolina  
29402

United States District Court  
For the District of South Carolina  
Charleston Division

By \_\_\_\_\_  
Sandra Wilder Rhodan, Pro Se  
2227 James Bell Blvd  
North Charleston, South Carolina 29406  
843 330-8763